

KOEHLER & ISAACS LLP

ATTORNEYS AT LAW
61BROADWAY, 25TH FLOOR
NEW YORK, NY 10006

Tel: (917) 551-1300 Fax: (917) 551-0030
www.koehler-isaacs.com

RICHARD J. KOEHLER
STEVEN ISAACS

JEANNETTE BALDASARRE
A. JAMES BELL
LIAM L. CASTRO
SONYA CHAZIN
RENA C. DAWSON
CYNTHIA DEVASIA
GABRIEL GREENBERG
TALIA HAYNES
DAVID KIRSCH
MERCEDES M. MALDONADO
FELICIA PINTO
ANDREW ROWE
JULIE PEARLMAN SCHATZ
ANN SCHNEIDER
STEPHANIE SWINTON
PETER C. TROXLER
HOWARD G. WIEN

OF COUNSEL
RAYMOND J. AAB
JESSICA SALLES
BARRY WASHOR

WRITER'S DIRECT DIAL
(917) 551-1317

December 11, 2019

Via ECF

Hon. J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Jose Nouel*, 19Cr761

Dear Judge Oetken:

I am CJA appointed counsel for Jose Nouel who is charged in the above referenced case with Count One Racketeering Conspiracy, Count Twelve Narcotics Conspiracy and Count Thirteen, Firearms Offenses.

I write to request approval for the appointment of Carlos Santiago, Esq. as associate counsel for the purpose of reviewing and summarizing discovery materials, as well as visiting and conferring with the client at the rate of \$90 per hour. Mr. Santiago is an experienced attorney who has been appointed under the CJA to assist on numerous cases in the Southern and Eastern District of New York where discovery was voluminous and in both electronic and document form, reviewing the same with the client and preparing legal memoranda and trial preparation. He would be a valuable addition to the defense and will result in significant cost savings to the Court.

I further submit that such appointment is necessary for the effective representation of this indigent defendant and is consistent with the statutory authority for the provision of ancillary services in an appointed case. Counsel specifically requests approval for an initial 100 hours at

\$90 hours without prejudice to seeking authority for additional time should the review goes beyond the 100 hours.

Thank you in advance for any and all consideration of this application. We will await further instructions from the Court on this matter.

Respectfully submitted,

A James Bell, Esq.

Cc: All counsel, by ECF

Granted
So Ordered.
December 13, 2019



J. PAUL OETKEN
United States District Judge